UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Albert Russo

CN 4853

Trenton, NJ 08650

(609) 587-6888

Standing Chapter 13 Trustee

In re:

Rosa Davila

Porfirio Davila, Jr.

Debtor(s)

Case No.: 18-17544 / MBK

Chapter 13

Hearing Date: 01/13/2021 9:00 AM

Judge: Michael B. Kaplan

TRUSTEE'S OBJECTION TO MOTION TO APPROVE FINANCING

Albert Russo, the Standing Chapter 13 Trustee, hereby objects to for the following reasons:

- 1. (1) The debtors need to provide updated proof of income, tax returns and an amended schedules I & J.
 - (2) The debtors need to provide information regarding how much they will be paying in deposits and down payments to the trustee.
 - (3) The motion should also include a motion to purchase property that includes disclosures.

Dated: January 11, 2021 /s/ Albert Russo

Albert Russo, Standing Chapter 13 Trustee

By: Erik Collazo, Staff Attorney